

1 THE HONORABLE JAMES L. ROBART
2
3
4
5
6
7
8
9

10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
12 SEATTLE
13
14

15 BRETT CALDWELL, an individual,
16
17 Plaintiff,
18
19 v.
20
21 THE BOEING COMPANY, a Delaware
22 Corporation and DOES 1-10;
23
24 Defendant.
25
26

Case No. 2:17-cv-01741-JLR

27 **STIPULATED MOTION FOR
28 EXTENSION OF TIME TO RESPOND TO
29 COMPLAINT AND ~~PROPOSED~~ ORDER**

30 **NOTE FOR MOTION: DECEMBER, 7,
31 2017**

32 The parties hereby file this stipulated motion pursuant to LCR 7(d)(1) and LCR 10(g) to
33 extend the deadline for Defendant The Boeing Company (“Boeing”) to file its Response to
34 Plaintiff’s Complaint, which was filed on November 17, 2017 and served on November 21, 2017
35 (Dkt. Nos. 1 & 7). In the absence of an Order extending the deadline to respond to Plaintiff’s
36 Complaint, Defendant Boeing’s response must be filed by no later than December 12, 2017.

37 The Parties now agree to extend Defendant’s time to answer, move, or otherwise respond
38 to the Complaint to provide time for counsel to investigate the facts and the law in order to
39 prepare an appropriate response to the Complaint, and Plaintiff’s counsel consented to the
40 requested extension. The Parties therefore join in asking the Court to extend the deadline for
41 Defendant to answer, move, or otherwise respond to the Complaint until December 29, 2017.

43 STIP. MTN FOR EXTENSION OF TIME TO RESPOND TO
44 COMPLAINT AND ~~PROPOSED~~ ORDER - (2:17-CV-01741-JLR) - 1

45 **Fox Rothschild LLP**
46 1001 FOURTH AVENUE, SUITE 4500
47 SEATTLE, WA 98154
48 206.624.3600

1 DATED this 7th day of December , 2017.
2
3

4 HELSELL FETTERMAN LLP

5 FOX ROTHSCHILD LLP

6 s/ Lauren Parris Watts (with permission)
7 Lauren Parris Watts, WSBA #44064
8 1001 Fourth Avenue, Suite 4200
9 Seattle, WA 98154-1154
10 Phone: (206) 292-1144
11 Fax: (206) 340-0902
12 lwatts@helsell.com

5 s/ Laurence A. Shapero
6 Laurence A. Shapero, WSBA #31301
7 Fox Rothschild LLP
8 1001 Fourth Avenue, Suite 4500
9 Seattle, WA 98154
10 Telephone: 206.624.3600
11 Facsimile: 206.389.1708
12 E-mail: lshapero@foxrothschild.com

13 HANEY & YOUNG LLP
14 Steven H. Haney, admitted *pro hac vice*
15 Gregory L. Young, admitted *pro hac vice*
16 1055 West Seventh Street, Suite 1950
17 Los Angeles, CA 90017
18 Phone: (213) 228-6500
19 Fax: (213) 228-6501

20 *Attorneys for Plaintiff*

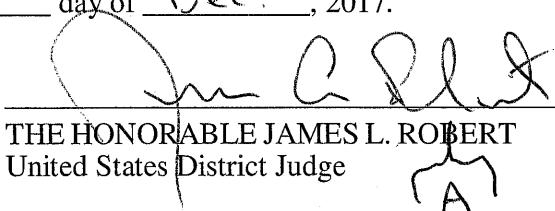
21 STIP. MTN FOR EXTENSION OF TIME TO RESPOND TO
22 COMPLAINT AND ~~PRO~~ ORDER - (2:17-CV-01741-JLR) - 2

23 **Fox ROTHSCHILD LLP**
24 1001 FOURTH AVENUE, SUITE 4500
25 SEATTLE, WA 98154
26 206.624.3600

PROPOSED ORDER

Pursuant to the stipulated motion of the parties as set forth above, IT IS HEREBY ORDERED that the motion is GRANTED, and IT IS HEREBY ORDERED that the deadline for Defendant to answer, move, or otherwise respond to Plaintiff's Complaint is extended to December 29, 2017.

IT IS SO ORDERED this 7th day of Dec., 2017.


THE HONORABLE JAMES L. ROBERT
United States District Judge

Presented By:

FOX ROTHSCHILD LLP

s/ Laurence A. Shapero
Laurence A. Shapero, WSBA #31301
1001 Fourth Avenue, #4500
Seattle, WA 98154
Phone: 206-624-3600
Fax: 206-389-1708
lshapero@foxrothschild.com
Attorney for Defendant

HESELL FETTERMAN LLP

s/ Lauren Parris Watts (with permission)
Lauren Parris Watts, WSBA #44064
1001 Fourth Avenue, Suite 4200
Seattle, WA 98154-1154
Phone: (206) 292-1144
Fax: (206) 340-0902
lwatts@helsell.com

HANEY & YOUNG LLP

Steven H. Haney, admitted pro hac vice
Gregory L. Young, admitted pro hac vice
1055 West Seventh Street, Suite 1950
Los Angeles, CA 90017
Phone: (213) 228-6500
Fax: (213) 228-6501

Attorneys for Plaintiff

STIP. MTN FOR EXTENSION OF TIME TO RESPOND TO
COMPLAINT AND ~~PRO~~ ORDER - (2:17-CV-01741-JLR) - 3

Fox ROTHSCHILD LLP
1001 FOURTH AVENUE, SUITE 4500
SEATTLE, WA 98154
206.624.3600

CERTIFICATE OF SERVICE

I hereby certify that on the date below written, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and caused to be served a true and correct copy of same by the method indicated below and addressed as follows:

Lauren Parris Watts, WSBA #44064
Helsell Fetterman LLP
1001 Fourth Avenue, Suite 4200
Seattle, WA 98154-1154
Phone: (206) 292-1144
Fax: (206) 340-0902
lwatts@helsell.com

Steven H. Haney, *admitted pro hac vice*
Gregory L. Young, *admitted pro hac vice*
Haney & Young LLP
1055 West Seventh Street, Suite 1950
Los Angeles, CA 90017
Phone: (213) 228-6500
Fax: (213) 228-6501

Attorney for Plaintiff

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 7, 2017, in accordance with 28 USC 1746.

Ashley M. Rogers
Ashley Rogers

STIP. MTN FOR EXTENSION OF TIME TO RESPOND TO
COMPLAINT AND ~~PROP.~~ ORDER - (2:17-CV-01741-JLR) - 4

Fox Rothschild LLP
1001 FOURTH AVENUE, SUITE 4500
SEATTLE, WA 98154
206.624.3600